

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

WILLIAM E. DUGAN, <i>et al.</i>)	
)	
Plaintiffs,)	CIVIL ACTION
)	
v.)	NO. 07 C 1419
)	
RICHARD M. TEE, individually and d/b/a)	JUDGE JOAN H. LEFKOW
RICHARD M. TEE EXCAVATING,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, RICHARD M. TEE, individually and d/b/a RICHARD M. TEE EXCAVATING, in the total amount of \$106,036.99, plus Plaintiffs' court costs and reasonable attorneys' fees totaling \$421.25.

On March 24, 2007, the Summons and Complaint was served on the Defendant by tendering a copy of said documents to him personally at his residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on April 13, 2007. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Jennifer L. Dunitz-Geiringer

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 1st day of May 2007:

Mr. Richard M. Tee
10S095 Schoger Drive
Naperville, IL 60584

Mr. Richard M. Tee
21 N. Wilmett
Westmont, IL 60559

/s/ Jennifer L. Dunitz-Geiringer

Jennifer L. Dunitz-Geiringer
Attorney for Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6237001
Telephone: (312) 236-4316
Facsimile: (312) 236-0241
E-Mail: jdunitz-geiringer@baumsigman.com

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